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22 and GOODRX HOLDINGS, INC.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

1 MINNESOTA INDEPENDENT
2 PHARMACISTS, individually and on
3 behalf of a class of those similarly
4 situated,

5 Plaintiff,

6 v.

7 GOODRX, INC.; GOODRX
8 HOLDINGS, INC.; CVS CAREMARK
9 CORP.; EXPRESS SCRIPTS, INC.;
10 MEDIMPACT HEALTHCARE
11 SYSTEMS, INC.; and NAVITUS
12 HEALTH SOLUTIONS, LLC
13 Defendants.

14 Case No. 2:24-cv-10297-CBM-SSC

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**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

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Earliest Complaint Served: 12/05/2024
Earliest Response Due: 12/26/2024
New Response Date: 01/10/2025

Honorable Judge Consuelo B. Marshall
United States District Judge

1 IT IS HEREBY STIPULATED and AGREED by and among Minnesota
2 Independent Pharmacists (“Plaintiff”) and GoodRx, Inc., GoodRx Holdings, Inc., CVS
3 Caremark Corp., Express Scripts, Inc., MedImpact Healthcare Systems, Inc., and Navitus
4 Health Solutions, LLC (collectively, “Defendants” and, together with Plaintiff, the
5 “Parties”), by and through their attorneys undersigned, pursuant to Federal Rule of Civil
6 Procedure 6(b), that:

7 1. Defendants’ time to answer, file a motion with respect to, or otherwise
8 respond to the Class Action Complaint filed by Plaintiff on November 27, 2024 [ECF No.
9 1] (the “Complaint”) is extended from the current deadline for each Defendant to respond
10 based on the date of service to Friday, January 10, 2025 (the “Extension Period”).

11 2. Good cause exists for the agreed extension because seven other actions
12 involving substantially similar defendants, making substantially similar allegations, and
13 asserting substantially similar causes of action have been filed in two federal district
14 courts (*Keaveny Drug, Inc. v. GoodRx, Inc., et al*, Case No. 2:24-cv-09379 in the United
15 States District Court for the Central District of California; *Community Care Pharmacy,
LLC v. GoodRx, Inc., et al.*, Case No. 2:24-cv-09490 in the United States District Court
16 for the Central District of California; *Grey Dog IV d/b/a/ Ethos Wellness/Pharmacy v.
GoodRx, Inc. et al.*, Case No. 2:24-cv-09858 in the United States District Court for the
17 Central District of California; *Esco Drug Co. v. GoodRx, Inc., et al.*, Case No. 2:24-cv-
18 10543 in the United States District Court for the Central District of California; *Old
Baltimore Pike Apothecary, Inc., et al. v. GoodRx Holdings, Inc., et al.*, Case No. 1:24-
19 cv-00453 in the United States District Court for the District of Rhode Island; *C&H
Pharmacy Inc., et al. v. GoodRx Holdings, Inc.*, Case No. 1:24-cv-00498 in the United
20 States District Court for the District of Rhode Island; and *Philadelphia Association of
Retail Druggists v. GoodRx, Inc., et al.*, Case No. 1:24-cv-00508 in the United States
21 District Court for the District of Rhode Island), and the Parties agree that the consolidation
22 of these actions in one court of competent jurisdiction would promote the just, efficient,
23 and fair resolution of the actions and conserve the courts’ and the Parties’ resources.

1 Moreover, the allegations in these complaints are complex.

2 3. IT IS FURTHER STIPULATED and AGREED that, during the Extension
3 Period, none of the Parties shall seek or be required to provide the disclosures or discovery
4 contemplated by Federal Rules of Civil Procedure 26, 30, 31, 33, 34, or 36.

5 4. IT IS FURTHER STIPULATED and AGREED that this stipulation does not
6 constitute a waiver of any of the Parties' claims, rights, or defenses, including but not
7 limited to the right to seek a further extension of Defendants' time to answer or otherwise
8 respond to the Complaint or any other pleading filed by Plaintiff in the above-captioned
9 action.

10 5. IT IS FURTHER STIPULATED and AGREED that, if Defendants answer,
11 move, or otherwise plead with respect to a complaint in a related case pending in any
12 district, Defendants will concurrently answer, move, or otherwise plead in response to the
13 Complaint.

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15 Dated: December 10, 2024

Respectfully submitted,

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12 Dated: December 10, 2024

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34 *Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(i), David R. Singh hereby*
35 *attests that concurrence in the filing of this document and its contents was obtained*
36 *from all signatories listed above.*